

Before the  
Federal Communications Commission  
Washington, D.C. 20554

RECEIVED  
DEC 6 1996

Federal Communications Commission  
Office of Secretary

In the Matter of )  
)  
Advanced Television Systems )  
and Their Impact Upon the )  
Existing Television Broadcast )  
Service )  
  
Fifth Further Notice of )  
Proposed Rule Making )

MM Docket No. 87-268

DOCKET FILE COPY ORIGINAL

TO: The Commission

**FURTHER COMMENTS OF CITIZENS FOR HDTV  
REGARDING  
THE MULTI-INDUSTRY 'COMPROMISE' RECOMMENDATION  
ON THE  
DIGITAL TELEVISION TRANSMISSION STANDARD**

These Further Comments are provided in response to the Commission's Public Notice (FCC 96-465), dated November 27, 1996, regarding the agreement filed with the Commission by representatives of the broadcast television, computer hardware and software, and consumer electronics manufacturing industries addressing the proposed digital television ("DTV") transmission standard before the Commission.

The Coalition's members are consumer and senior citizens groups, labor unions, manufacturers, retailers, and trade press deeply concerned about preservation of free over-the-air television broadcasting. They are also keenly

No. of Copies rec'd  
List ABCDE

0+12

interested in the speedy, consumer-friendly conversion to digital broadcasting, including high definition television ("HDTV"), and the competition and new services which it promises.

In brief, the Coalition, respectfully urges the Commission to accept this agreement in order to complete this, the first of three FCC actions needed to begin the too-long delayed national transition to digital broadcasting. The agreement does not affect most of the key elements of the DTV Standard, as originally roposed for adoption by the Commission. This means that the broadcast and consumer manufacturing industries can proceed in a way that still gives consumers choices in services and cost of entry during the switch to digital broadcasting. Therefore, on balance, we believe that this agreement represents a positive step, and, in order to signal the start of the transition, we believe the Commission should accept it.

\* \* \*

The Citizens for HDTV Coalition submits that this agreement is not the optimal solution to the objections raised by some to adoption by the Commission of the full ATSC Digital Television Standard ("DTV Standard"). To be sure, we believe those objections were misguided, as the DTV Standard is an inclusive and permissive mechanism; and it would still be preferable for the Commission to adopt it, as originally proposed, for all the reasons which the Commission itself, the Coalition, and others elaborated earlier in

this proceeding.

But everyone involved in the transition also needs the certainty of finally getting underway with this national effort, and doing so in the confidence that free, over-the-air broadcasting still has a chance to compete with other distribution media already converting to and launching digital transmission. In turn, this competition will yield new services and opportunities for America and its consumers, while providing the best chance for maintaining and increasing jobs in this country to support the transition itself and new products and services.

Under this agreement, the FCC would not adopt the DTV Standard's specific video parameters; but it would adopt in its Rules all the other key elements of the proposed DTV Standard. This means that the fundamental designs are preserved, such as compression, coding, packetization, and modulation, so that broadcasters and manufacturers can move forward. Also, the core requirements are retained, such as full MPEG-2 video compliance, so that consumers continue to benefit from microprocessors and circuits made for this world-wide, cost-effective standard. Finally, it was broadcasters and manufacturers who unanimously adopted the industry's ATSC Standard; and adherence to this standard, as they have stated in their public comments, will help maximize choice and minimize confusion in consumer purchase decisions. Indeed, after nearly ten years of review and watching digital implementation proceed rapidly in other media, broadcasters and

manufacturers are clear about the competitive urgency of their vigorously implementing digital transmission, including HDTV.

While the agreement to drop the video formats does not offer any new guidance to manufacturers of receivers as to what they should build, either for a TV or a PC, it does suggest that it will be up to consumers—unless they have a niche interest in some sort of specialized service—to demand that their ‘receivers’ be able to capture and display any and all ‘digital TV’ signals broadcast by any ‘TV’ transmitter anywhere in the country. As this would have been the case with the full standard, and will still be the case with the amended standard, then the agreement does not pose any new challenge in principle.

The real challenge, however, after this agreement on the standard, is to keep focused on the central thrust of the Commission’s advanced television proceeding: to give terrestrial broadcasting a chance to compete with other media, in turn providing choices in service and cost which consumers deserve. Therefore, equally important are the prompt completion of the nationwide allotment and assignment of the channels for digital broadcasting, and the adoption of any rules for implementation of and transition to digital broadcasting. These two actions are also required to begin the extraordinary national effort to completely *replace* America’s unique and ubiquitous free over-the-air television service.

We deeply appreciate the Commission's attention to the speediest possible adoption of the standard, as a signal that the transition is about to begin. With proceedings well under way and schedules announced for early 1997, we also appreciate the Commission's efforts now to complete the channel and transition rules proceedings. In order to advance and smooth that transition, and to promote the most competition in services and equipment from the outset, we earnestly hope for final Commission action on these matters in the first few months of 1997.

\* \* \*

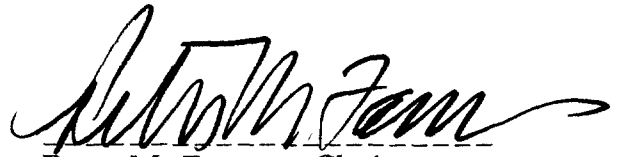
Therefore, the Coalition respectfully urges the Commission to:

- Adopt the DTV transmission standard as proposed in its May 9, 1996 Notice of Proposed Rule Making, amended only in accord with the agreement, *i.e.*, deleting the table specifying video format parameters. We urge that this be done before the end of 1996 in order, finally, to signal the start of the competition foreseen by the DTV Standard and this agreement.
- Take every action possible to avoid delays in completing the other two outstanding proceedings needed to effectuate this amended DTV Standard, *i.e.*, making nation-wide broadcast channel allotments and assignments, and adopting digital broadcasting implementation and transition rules. We urge that these matters be completed as early in 1997 as possible, preferably in the first few months, inasmuch as the digital conversion for broadcasting may

already be said to be too far behind that of other distribution media.

The Coalition believes that, together, these steps will start the speediest possible conversion to digital transmission, which is the key to maintaining a robust terrestrial broadcast television service accessible to virtually all Americans. This, in turn, is the *sine qua non* for competition in choice and cost for consumers in television and new services, and in maximizing jobs in America in the related industries, as we have discussed in our earlier Comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Peter M. Fannon", written over a horizontal dashed line.

Peter M. Fannon, Chairman

Citizens for HDTV  
1750 K Street, N.W., Suite 800  
Washington, D.C. 20006  
Tel: 202/429-7371  
FAX: 202/828-7529

December 6, 1996